

# Exhibit Z

Doug Fleurant  
February 21, 2024

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE DISTRICT OF MASSACHUSETTS

3 CASE NO. 1:23-CV-11085-RGS

4 PREPARED FOOD PHOTOS, INC.  
5 f/k/a ADLIFE MARKETING &  
6 COMMUNICATIONS CO., INC.,  
7 Plaintiff,

8 v.

9 WENEEDAVACATION.COM, LLC

10 Defendant.  
11 \_\_\_\_\_/

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REMOTE DEPOSITION OF

16

DOUG FLEURANT

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VOLUME 1 (Pages 1 - 20)

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February 21, 2024

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11:03 a.m. - 11:22 a.m.

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LOCATION: Remote via Zoom  
Pawtucket, Rhode Island

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Reported by: Bridgitt Myers,  
Cert No. CDR-2895.

24

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Job No.: 350281

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1           A.    No specific plan short of just trying to  
2   protect our property.

3           Q.    Why did PFP decide to start to pursue  
4   infringers?

5           A.    Revenues associated with licensing dropped  
6   considerably and we realized it's because people were  
7   stealing the images as opposed to licensing them.

8           Q.    Was there any analysis done on the profits that  
9   could be earned for IP infringement or, sorry, for IP  
10   enforcement?

11          A.    No, the goal was to just cease the, the illegal  
12   use, the unauthorized use.

13          Q.    Did that goal change at any point in time?

14          A.    No. To this day, our goal is to prevent the  
15   unlicensed use and to try to increase the licensing.

16          Q.    And it's my understanding that PFP earns  
17   approximately 120,000 from its licensing each year. How  
18   does it support its business without the IP enforcement  
19   revenue?

20          A.    The costs -- the costs associated with the  
21   licensing are minimal. The library is in place, so the  
22   only expense, basically, is the software required to run  
23   the subscription service.

24          Q.    And so the rest of the employees that work for  
25   PFP primarily run the IP enforcement section of the

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1 company?

2 A. Manage or work for, yes.

3 Q. And has there ever been any discussion  
4 surrounding the financial benefits of pursuing  
5 infringements?

6 A. There is a financial benefit, but that was not  
7 the point of any discussion. Any discussion was to  
8 prevent the unlicensed use, whatever we had to do to  
9 protect our rights and cease that unlicensed use.

10 Q. Has it ever been too expensive to pursue  
11 infringers?

12 A. We have not recognized that yet, no.

13 Q. And so I'll move at that -- at this point to  
14 topic two, which is regarding the profits or revenues  
15 made from the monthly subscriptions versus the IP  
16 enforcement revenues. Have you had any discussions  
17 regarding this topic, other than with your attorney,  
18 within PFP?

19 A. Could you restate the question, just to be sure  
20 I understand it properly?

21 Q. Sure. I don't want to get into anything you  
22 discussed with your attorney. But to prepare for this  
23 topic, did you have any discussions with anyone else in  
24 PFP?

25 A. No. To prepare for this deposition, I did not.